

Certified Mail No.
Certified Receipt Requested

In reply, refer to WST-3

NOTICE OF VIOLATION

Diana Crane
Quality Manager
Associated Plating Co.
9636 Ann St.
Santa Fe Springs, CA 90670

Dear Ms. Crane:

On November 17, 2003, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative from the Santa Fe Springs Fire Department Environmental Protection Division, at Associated Plating Co. located at 9636 Ann St., Santa Fe Springs, CA 90670, EPA Identification Number CAD043079110. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with all applicable regulations.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to perform the following tasks:

I) Perform a waste determination on the liquid underneath the grating in the nickel stripping area. If this liquid has already been containerized and transported offsite for disposal, please provide EPA with a copy of the manifest (or if this manifest was already included in your December 22, 2003 letter to EPA, please indicate the manifest number and date);

II) Create and implement a weekly inspection checklist to be used for all waste storage areas and satellite accumulation areas. This checklist should include at a minimum:

- that all hazardous waste containers stored on the facility premises meet all labeling requirements;**
- that no more than 55 gallons of a particular wastestream be stored at any satellite**

- accumulation area;
- that all hazardous waste containers be closed (including with locking rings) when waste is not being added or removed from the containers;
- that there be proper access to all hazardous waste containers;
- that all hazardous waste containers be in good condition;
- that no hazardous waste be stored beyond the permitted storage time;

Please send a copy of this checklist to EPA.

III) Install an internal alarm for the 180-day hazardous waste storage area, as is required under CCR Title 22 §66265.34(a). Please provide EPA photographic documentation of this;

IV) Please provide a complete contingency plan that includes a list of all emergency equipment, along with each emergency device's location and a brief description of the device, as required under CCR Title 22 §66265.52(e)

By copy of this letter, EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. EPA is also providing the State with notice that EPA may take appropriate enforcement action. The State of California may notify EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations. EPA reserves the right to take further enforcement action as it deems appropriate.

EPA routinely provides copies of investigation reports to state agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fourteen (14) calendar days from the date of receipt of this letter. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See, also, 5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a).

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to EPA within thirty (30) calendar days from the date of receipt of this letter. Please address the submittal to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Office
U.S. Environmental Protection Agency,

75 Hawthorne Street
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter,
please contact Clint Seiter at (415) 972-3298.

Sincerely,

Loren Henning, Manager
RCRA Enforcement Office

Enclosure

cc w/o enclosure: Steve Lavinger, DTSC
Richard Kallman, Santa Fe Springs Fire Department

MAIL CODE	WST-3	WST-3	WST-3	WST-3		
SURNAME	SEITER	band	Henning	Henning		
DATE	1-28-04	1-28-04	3/3/04	3/18/04		

U.S. EPA CONCURRENCES

OFFICIAL FILE/COPY conform to regulatory requirements.



CM&E Enforcements List


ASSOCIATED PLATING COMPANY, INCORPORATED
SANTA FE SPRINGS
CAD043079110

Select the Enforcement to process or choose the Add New Enforcement button below:

Your search has found no Enforcements.

Enforcements							Violations						
Act Loc	Seq #	Type	Date	Agency	Resp Person	Enforcement Desc	Determined Date	Seq #	Type	Resp Agency	Class - Priority	Latest Sched RTC	Actual RTC

Add New Enforcement

Go To



URL: CME_enf_main.asp

DTSC inspected 2001?

HOTEL TO ASSOCIATED PLATING

[Back to Directions](#)

Starting Point:
Downey, CA 90241-3843

Arriving at:
Santa Fe Springs, CA 90670-2902

Distance:

Approximate Travel Time: 12 mins

Directions

1. Start at **8425 FIRESTONE BLVD, DOWNEY** going towards **BROOKSHIRE AVE** - go 1.9 mi
2. Turn **L** to take **I-605 NORTH** - go 1.6 mi
3. Take the **TELEGRAPH RD** exit towards **SANTA FE SPRINGS** - go 0.3 mi
4. Bear **R** on **TELEGRAPH RD** - go 1.7 mi
5. Turn **L** on **SANTA FE SPRINGS RD** - go 0.9 mi
6. Turn **L** on **SORENSEN AVE** - go 0.1 mi
7. Turn **L** on **ANN ST** - go < 0.1 mi
8. Arrive at **9636 ANN ST, SANTA FE SPRINGS**

When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists.

Full Route



Associated Plating CAD043079110	9636 Ann St SANTA FE SPRINGS	Other CBI
Foss Plating CAD008278236	8140 Secura Way Santa Fe Springs	
Chemcentral/Los Angeles CAT000612119	13900 Carmenita Road Santa Fe Springs	
Goodrich Corp CAD981462377	9920 Freeman Ave Santa Fe Springs	
Atlas Radiator CAD029404084	10110 S. Norwalk Blvd Santa Fe Springs	
<u>Back-ups</u>		
Mid West Fabrication CAD004295572	8623 Dice Rd. Santa Fe Springs	
Electronic Chrome & Grinding Co CAD008391427	9132 Dice Rd Santa Fe Springs	
Precision Control Finishing CAR000064329	12150 S Bloomfield Ave Suite D Santa Fe Springs	

Other CBI



CAD043079110

2F 7A

DO NOT CASH UNLESS YOU CAN VERIFY ADVANCED SECURITY FEATURES

BANK of ORANGE COUNTY

Other CBI

Corporate Office
649 Lincoln Way
Auburn, CA 95603



CASHIER'S CHECK

Date: 05/03/06

Other CBI

A Division of Placer Sierra Bank

Remitter: ASSOCIATED PLATING CO INC

PAY

\$5,133.53

TO FIVE THOUSAND ONE HUNDRED THIRTY THREE and 53/100***USDollars

THE ORDER OF ***TREASURER OF THE UNITED STATES***

OF ***ID #CAD043079110***

DOCKET #RCRA-9-2005-0023

Other CBI

AUTHENTICITY INFORMATION ON REVERSE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Notification of Intent to File a Determination of Violation, Compliance Order and Notice of Right to Request a Hearing against Associated Plating Co.

Diana Crane
Quality Manager
Associated Plating Co.
9636 Ann St.
Santa Fe Springs, CA 90670
CAD043079110

Dear Ms. Crane:

On November 17, 2003, representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative of the Santa Fe Springs Fire Department, conducted a Resource Conservation and Recovery Act ("RCRA") inspection at Associated Plating Co., located in Santa Fe Springs, CA, with EPA Identification Number CAD043079110. Based on information gathered during and after the inspection, the EPA is preparing to bring an administrative action against Associated Plating Co. to ensure compliance and assess penalties, pursuant to Section 3008(a)(1) of RCRA, as amended (42 U.S.C. § 6928(a)(1)).

The allegations being considered are violations of the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20, and the regulations adopted pursuant thereto and specified below. The allegations being considered are also violations of Section 3002 of RCRA 42 U.S.C §§6922, and its implementing regulations. The allegations against Associated Plating Co. are:

1. **Failure to make a hazardous waste determination** in violation of C.C.R. §66262.11 [40 C.F.R. § 262.11];
2. **Storage of hazardous waste without a permit** in violation of C.C.R. §§ 66262.34(a) and 66270.1 [40 C.F.R. §§ 262.34(a) and 270.1];
3. **Open containers** in violation of C.C.R. §§66262.34(a)(1)(A) and 66265.173(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)];
4. **Failure to have an alarm in the waste storage area** in violation of C.C.R.

§§66262.34(a)(1)(A) and 66265.34(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.34(a)];

5. **Lack of aisle space** in violation of C.C.R. §§66262.34(a)(1)(A) and 66265.35 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.35)];
6. **Incomplete contingency plan** in violation of C.C.R. §§66262.34(a)(4) and 66265.52 [40 C.F.R. §§262.34(d)(4) and 265.52];

In anticipation of filing a Determination of Violation, Compliance Order and Notice of Right to Request a Hearing (hereinafter "Complaint") against Associated Plating Co., the EPA is extending Associated Plating Co. the opportunity to submit any information that the EPA should consider before issuing the Complaint. Relevant information may include any evidence of reliance on compliance assistance, additional compliance tasks performed subsequent to the inspection, or financial factors bearing on Associated Plating Co.'s ability to pay a civil penalty. In addition, the EPA encourages Associated Plating Co. to explore the possibility of settlement. If you are interested in commencing settlement negotiations, please contact Clint Seiter of my staff at (415) 972-3298, or have your counsel contact Julia Jackson in our Office of Regional Counsel at (415) 972-3948 within 21 days from the receipt of this letter to schedule a meeting or conference call.

It is EPA's intention to file a Complaint against Associated Plating Co. within the next six (6) weeks unless Associated Plating Co. advises the EPA of substantial reasons not to proceed. Please send your response by certified mail, return receipt requested, addressed to:

Clint Seiter
Mailcode: WST-3
RCRA Enforcement Office
US Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Any penalty proposed for violations of RCRA and its implementing regulations will be calculated pursuant to the EPA's "RCRA Civil Penalty Policy," a copy of which has been enclosed. Also enclosed is a copy of the EPA's "Supplemental Environmental Projects Policy" ("SEP Policy"). The EPA's SEP Policy describes the terms under which a commitment to perform an environmental project may mitigate, in part, an EPA civil penalty. The EPA offers small businesses a wide variety of compliance assistance resources and tools designed to assist them to comply with Federal and State environmental laws. These resources and tools are contained in the enclosed fact sheet of supplemental information for small businesses subject to an EPA enforcement action. Also enclosed for your information are requirements of the Securities and Exchange Commission ("SEC Notice") for "registrants" to provide information on environmental legal proceedings to the public. To determine the applicability of these requirements to your company, you should seek competent legal counsel as described in the enclosed SEC Notice.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim according to 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. The EPA will construe the failure to furnish a confidentiality claim within 14 calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

Thank you for your prompt attention to this matter. If you have any questions, please contact Clint Seiter of my staff at (415) 972- 3298, or have your counsel contact Julia Jackson in our Office of Regional Counsel at (415) 972- 3948.

Sincerely,

Loren Henning, Manager
RCRA Enforcement Office

Enclosures

cc (w/o enclosures):

Steve Lavinger, DTSC
Richard Kallman, Santa Fe Springs Fire Department
Julia Jackson (ORC)]

MAIL CODE	WST-3	WST-3	ORC-3			
SURNAME	SEITER	Henning				
DATE	5-27-04	6/1/04				

US EPA CONCURRENCES

OFFICIAL FILE COPY

ROUTING AND TRANSMITTAL SLIP FOR INSPECTION REPORTSFROM: CLINT SETTEREXT: 2-3298 MAIL CODE: WST-3FACILITY NAME: ASSOCIATED PLATING

	Initials	Date
1. 1st Inspector (Report Writer):	CTS	1-28-04
– ARIS Entry (CEI Date, CE105)	CTS	1-28-04
– ARIS Entry (Enforcement - Verbal, Written, Formal, etc.):		
– POETS Data Entry (Formal Cases Only):		
2. 2nd Inspector (Reviewer):	B	1/28/04
3. QA/QC Reviewer: <i>recd 2/9</i>	119R	3/3/04
4. Supervisor:	OK	3/18/04
5. Lou Tully:	27	3/18/04
6. 1st Inspector (File):		

NOTES:

New Routing Slip available @ 1:1 Inspection & enf. SOPs/ Inspection Reports/

01. Insp Rpt - Route Slip

November 12, 2003

Got a call from Richard Callman ((562) 906-3810) of the Santa Fe CUPA about the upcoming inspections. We worked out the following inspection schedule:

Monday: Associated Plating

Tuesday: Goodrich Corporation

Wednesday: Atlas Radiator

Thursday: Mid West Fabrication

Friday: Precision Control Finishing

We agreed to meet with Richard in his office at 8:00 Monday morning. His address is 11300 Greenstone Avenue, Santa Fe Springs.

Cell phone: 415-517-3866

Sand is injected from the hoppers into a heated, spinning mold and comes out as a core. No hazardous waste is generated or stored in this area.

- Wastewater Treatment Unit

The wastewater treatment system is described above under "Process Description". No hazardous waste is generated or stored in this area.

Record Review

Manifests: No violations noted.

Biennial Report: No violations noted

Contingency Plan: The facility representatives were not able to present a contingency plan to the inspectors at the time of the inspection as required under the CCR Title 22 §66265.52.

Training Records: The facility representatives were not able to present training records to the inspectors at the time of the inspection as required under the CCR Title 22 §66265.16(d). Per Mr. Olvera, annual refresher training has not been provided to those facility employees responsible for the management and oversight of hazardous waste generated on the facility premises. Mr. Olvera did provide documentation that basic training concerning the management of hazardous waste is provided initially to the facility employees who manage hazardous waste.